


MATTHEW J. KLUGER
ATTORNEY AT LAW

888 GRAND CONCOURSE, SUITE 1H
BRONX, NEW YORK 10451
(718) 293-4900 • FAX (718) 618-0140
www.klugerlawfirm.c

August 3, 2021

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 8/4/2021

By ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Franklin Mejia Martinez
21 Cr. 408 (VSB)

Dear Judge Broderick,

The status conference scheduled for August 5, 2021 is hereby adjourned to September 23, 2021 at 9:00 a.m. The adjournment is necessary to permit counsel sufficient time to review discovery and continue to discuss a possible pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between August 5, 2021 and September 23, 2021 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.

A status conference in this matter is scheduled for Thursday, August 5, 2021 at 9:00 a.m. Since the last court date, defense counsel has continued to meet with Mr. Mejia-Martinez at jail, engage in plea discussions with the Government, and review discovery. Although some details remain unresolved, the defense is optimistic that an agreement with the government will be reached. Accordingly, the defense respectfully requests that the status conference be adjourned for 45-days to allow the parties additional time to complete their plea negotiations.

I have discussed the above with A.U.S.A. Rebecca Dell, who consents to this adjournment request. For the above reasons, as well as in the interests of justice, the defense consents to the exclusion of time under the Speedy Trial Act until the anticipated adjourn date.

Thank you.

Respectfully Submitted,

/s/ Matthew J. Kluger

Matthew J. Kluger, Esq.

cc: AUSA's Rebecca Dell